STATE OF ILLINOIS SECRETARY OF STATE SECURITIES DEPARTMENT

IN THE MATTER OF: SELECT LIBERTY FINANCIAL

GROUP, LLC

ITS OFFICERS, DIRECTORS,

EMPLOYEES, AFFILIATES, SUCCESSORS,)

)File No.1200251

AGENTS AND ASSIGNS AND TOMMIE BELL

TEMPORARY ORDER OF PROHIBITION

TO THE RESPONDENT: Select Liberty Financial Group, LLC

Tommie Bell

Substitute Service:

Secretary of State Index Department

On information and belief, I, Jesse White, Secretary of State for the State of Illinois, through my designated representative, having been fully advised in the premises by the staff of the Illinois Securities Department, Office of the Secretary of State, herein find:

- 1. That Réspondent, Select Liberty Financial Group, LLC, purports to be a limited liability company registered in India.
- 2. That Respondent, Select Liberty Financial Group, LLC, purports to be located at 657 W. Port Royale Lane, Tucson, Arizona 85701 in the United States. The address does not exist according to the United States Postal Service.
- That, on an investment blog website, Respondent, Select Liberty Financial Group, LLC, purports to have its main office at Level 2 Kalpataru Synergy, Opposite Grand Hyatt Santacruz, Mumbai: 400 075 INDIA. The address is the location of The Executive Centre at Kalpataru Synergy, Mumbai, which provides temporary executive office space and virtual offices, allowing businesses

to have a corporate address and phone answering services, among other amenities.

- 4. That Respondent, Select Liberty Financial Group, LLC, has a website, www.selectliberty.com, advertising that it specializes in providing advice regarding the following investments:
 - Private Placement Ventures
 - Medium Term Notes (MTNs)
 - Various Companies Shares
 - Venture Capital Project Development
 - Annuities
 - Real Estate Acquisitions
 - Private Equity
 - Precious Metals
 - Oil
 - Diamonds
 - Gold
- 5. That, on the aforementioned website, Respondent, Select Liberty Financial Group, LLC, purports to be "an Privately owned diversified Cash flow and wealth management firm" [sic], established in 2006 by experts with over thirty (30) years of investment experience.
- 6. That Respondent, Select Liberty Financial Group, LLC, previously admitted on the aforementioned website that it is not licensed to be a securities dealer, broker or investment advisor and claimed that any transactions on the site would be considered private placements. However, as of this writing, that language has been removed from the website.
- 7. That the aforementioned website currently states that Respondent, Select Liberty Financial Group, LLC, provides "clients with the regulatory and compliance expertise necessary to meet the ever changing challenges of the current regulatory environment".
- 8. That the aforementioned website was registered on December 8, 2011 by Tucows, Inc. for a private customer.
- 9. That Respondent, Tommie Bell, sent spam emails soliciting investors, including at least one Illinois resident, for www.selectliberty.com.

- 10. That Respondent, Tommie Bell, updated the company profile for Select Liberty Financial Group, LLC on www.manta.com where the only address provided for the company is "Tucson, AZ 85701".
- 11. That on LinkedIn.com, there is a Select Liberty Financial Group which was created on January 25, 2012 by a "Tommie B." The link for Tommie B. takes users of the website to the profile for Tommie Bell, a "Manager" in Minneapolis, Minnesota in the Financial Services Industry.
- 12. That the above-mentioned Respondents, Select Liberty Financial Group, LLC and Tommie Bell, are investment advisers as that term is defined pursuant to Section 2.11 of the Act.
- 13. That Section 8 of the Act provides, <u>inter alia</u>, that every investment adviser shall be registered as such with the Secretary of State.
- 14. That Section 12.C of the Act provides, <u>inter alia</u>, that it shall be a violation of the Act for any person to act as an investment adviser unless registered as required under the Act.
- 15. That Section 12.J of the Act provides, inter alia, that it shall be a violation of the Act to (i) employ any device, scheme or artifice to defraud in connection with the sale or purchase of any security, directly or indirectly; (ii) engage in any transaction, practice or course of business which operates as a fraud or deceit upon any client or prospective client; or (iii) engage in any act, practice or course of business which is fraudulent, deceptive or manipulative while acting as an investment adviser.
- 16. That at all times relevant hereto, the Respondents, Select Liberty Financial Group, LLC (its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns) and Tommie Bell, failed to register as investment advisers prior to the offer and/or sale of services in the State of Illinois.
- 17. That at all times relevant hereto, the Respondents, Select Liberty Financial Group, LLC (its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns) and Tommie Bell, while acting as an

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investment adviser deceived prospective clients as to the legality of Respondents' services and Respondents' location.

- 18. That by virtue of the foregoing, the Respondents, Select Liberty Financial Group, LLC (its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns) and Tommie Bell, have violated Sections 12.A, 12.C and 12.J of the Act.
- 19. That Section 11.F.(2) of the Act provides, inter alia, that the Secretary of State may temporarily suspend or prohibit the offer or sale of securities by any person if the Secretary of State in his or her opinion, based upon credible evidence, deems it necessary to prevent an imminent violation of the Act or to prevent losses to investors which the Secretary of State reasonably believes will occur as a result of a prior violation of the Act.
- That based upon the foregoing, the Secretary of State deems it necessary, in order to prevent imminent and additional violations of the Act, and to prevent losses to investors as a result of the referenced prior violation of the Act, to enter an order pursuant to the authority granted under Section 11.F of the Act which prohibits the Respondents, Select Liberty Financial Group, LLC (its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns) and Tommie Bell, from rendering investment advice in the State of Illinois.
- 21. That based upon the credible evidence available to the Secretary of State, the entry of this Temporary Order is in the public interest and is consistent with the purposes of the Act.
- That Section 11.E(4) of the Act provides, inter alia, that if the Secretary of State, after finding that any provision of the Act has been violated, may impose a fine as provided by rule, regulation or order not to exceed \$10,000 for each violation of the Act, as well as the costs of investigation and reasonable expenses.
- 23. That by virtue of the foregoing, Respondents, Select Liberty Financial Group, LLC (its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns) and Tommie Bell, are subject to a fine of up to \$10,000 per violation, costs of investigation, reasonable

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expenses, an order of censure and an order which permanently prohibits the Respondent from rendering investment advice in the State of Illinois.

NOW THEREFORE, IT IS HEREBY ORDERED THAT: pursuant to the authority granted by Section 11.F of the Act, Select Liberty Financial Group, LLC (its Officers, Directors, Employees, Affiliates, Successors, Agents and Assigns) and Tommie Bell are hereby PROHIBITED from rendering investment advice in or from the State of Illinois until further order of the Secretary of State.

NOTICE is hereby given that the Respondents may request a hearing on this matter by transmitting such request in writing to Securities Director, Illinois Securities Department, 300 W. Jefferson St., Suite 300A, Springfield, Illinois 62702. Such request must be made within thirty (30) days of the date of entry of this Temporary Order. Upon receipt of a request for hearing, a hearing will be scheduled. Request for hearing will not stop the effectiveness of this Temporary Order and will extend the effectiveness of this Temporary Order for ninety days from the date the hearing request is received by the Department.

FAILURE BY ANY RESPONDENT TO REQUEST A HEARING WITHIN THIRTY (30) DAYS AFTER ENTRY OF THIS TEMPORARY ORDER SHALL CONSTITUTE AN ADMISSION OF ANY FACTS ALLEGED HEREIN AND CONSTITUTES SUFFICIENT BASIS TO MAKE THE TEMPORARY ORDER FINAL.

entered: This May of Janua

Desse White of

Secretary of State State of Illinois

Attorney for the Secretary of State: Shannon Bond Illinois Securities Department 300 W. Jefferson St., Suite 300A Springfield, Illinois 62702 Telephone: (217) 524-0648